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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

Spinner Family Holdings LLC et al

vs.

GRG CHUBB1 LLC et al

Civil Action No. 18-01507 (JNP)

**NOTICE OF MOTION TO AMEND
THE COMPLAINT AND REMAND
TO STATE COURT**

PLEASE TAKE NOTICE, that on April 16, 2019, or as soon thereafter as counsel can be heard, Spinner Family Holdings (“SFH”), Tom Spinner, and Maria Spinner (collectively “Spinner”), by and through the undersigned counsel, shall move before the Honorable Jerome N. Poslusny, at the United States District Court for the District of New Jersey, at the Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor Camden, New Jersey for the entry of an Order granting Spinner’s Motion to Amend the Complaint pursuant to Fed. R.

Civ. P. 15(a) and Motion to Remand to State Court pursuant to 28 U.S.C § 1334(c)(2), 28 U.S.C. § 1334(c)(1), 28 U.S.C. § 1452(b), and 28 U.S.C. § 1447(c).

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Spinner has submitted contemporaneously herewith a memorandum of law, and refers this Honorable Court to the same for further explication of the grounds upon which this motion is based.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

RESPECTFULLY SUBMITTED this 19th day of March, 2019.

Respectfully submitted,

SPIRO HARRISON

/s/ Adlai J.J. Small

Adlai J.J. Small

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Attorneys for Plaintiffs

CERTIFICATE OF
SERVICE

I hereby certify that on March 19, 2019, I filed the foregoing document via this Court's CM/ECF system, which caused electronic notice to be sent to all ECF-registered parties.

/s/ Adlai J.J. Small
Adlai J.J. Small